

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRADLEY
(USPS-T-13) TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T13-35(b))

The United States Postal Service hereby provides the response of witness Bradley (USPS-T-13) to the following interrogatory of United Parcel Service: UPS/USPS-T13-35(b), filed on September 8, 1997. An objection to interrogatory UPS/USPS-T13-35(a) was filed on September 18, 1997.

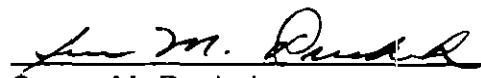
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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September 22, 1997

Response of United States Postal Service Witness Bradley
to
Interrogatories of United Parcel Service

UPS/USPS-T13-35. Please refer to page 12 of your testimony, and to the HCSS database.

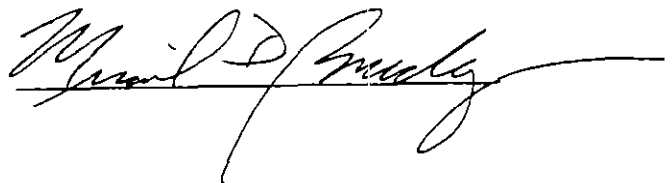
- (a) In addition to the seven “key variables” you list on page 12 of your testimony, please identify and describe the specific information that is available in HCSS for each contract.
- (b) Provide a record layout and definitions of the HCSS database.

UPS/USPS-T13-35 Response:

- a. An objection to this part of the interrogatory has been filed.
- b. The record layout for my HCSS database is provided in [Docket No. MC97-2] Workpaper WP-1. I am not familiar with and have not seen the record layout and definitions for the entire HCSS. To acquire the data necessary for updating and refining the Commission Docket No. R87-1 analysis, I simply requested those data from HCSS experts. A complete listing of the variables that I requested and how they are constructed is presented in Workpaper WP-1.

DECLARATION

I, Michael D. Bradley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, reading "Michael D. Bradley", written over a horizontal line.

Dated: Sept 22, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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